

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA)
)
v.) **CASE NO. 23-4650**
)
SAMUEL SULLIVAN, JR.)

**UNITED STATES OF AMERICA'S MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE BRIEF**

The United States of America, by its undersigned attorneys, hereby moves the Court to extend the time for filing the government's response brief to and including June 24, 2024, for the following reasons:

1. The defendant in this case was convicted of bank robbery, in violation of 18 U.S.C. § 2113, Hobbs Act robbery, in violation of 18 U.S.C. § 1951, and the use of a firearm in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c). ECF 91. On September 22, 2023, he was sentenced to 252 months in prison.

2. The defendant has now appealed.

3. On April 29, 2024, the defendant filed his opening brief in this appeal.

Appellate ECF 19. The government's response brief is currently due on May 22, 2024.

4. Counsel have recently been in communication. Undersigned counsel understands that the defendant may seek leave to file an amended opening brief. Accordingly, it may be prudent to delay the filing of a response brief so that the government can accurately respond to all the arguments the defendant is pressing. Additionally, because of the press of numerous other matters before this Court and the District Court, undersigned counsel will not be in a position to draft and file the government's response brief by the current deadline.

5. Accordingly, the government respectfully requests an extension of time from the current deadline through and including June 24, 2024.

6. Counsel for the defendant has graciously indicated via email that he does not object to the requested extension of time.

Wherefore, the government respectfully requests that the Court will grant this motion and extend the time for filing its response brief up to and including June 24, 2024.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: _____/s/
Jason D. Medinger
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that on this 19th day of May, 2024, a copy of the foregoing Motion for Extension of Time was filed via CM/ECF, and was thereby served upon counsel of record for the defendant.

/s/
Jason D. Medinger
Assistant United States Attorney